

**Exhibit 3**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|   |   |                        |
|---|---|------------------------|
| _____                                     | ) |                        |
| In re:                                    | ) | Case No. 12-12020 (MG) |
|   | ) |                        |
| RESIDENTIAL CAPITAL, LLC, <u>et al.</u> , | ) | Chapter 11             |
|   | ) |                        |
| Debtors.                                  | ) | Jointly Administered   |
| _____                                     | ) |                        |

**DECLARATION OF GREGORY L. HUBER IN SUPPORT OF THE RESCAP  
BORROWER CLAIMS TRUST'S OBJECTION TO CLAIM NO. 684 FILED BY  
BERNARD WARD AND COLLEEN HALLORAN**

I, Gregory L. Huber, hereby declare as follows:

1. I am over the age of 21 and competent to testify in this matter. I have personal knowledge of the matters stated herein unless otherwise indicated.

2. I am an attorney licensed to practice in the State of California. I am a lawyer at the law firm Severson & Werson (the "Firm"), and my office address is One Embarcadero Center, 26<sup>th</sup> Floor, San Francisco, CA 94111.

3. I am counsel of record for GMAC Mortgage, LLC ("GMACM") in the matter styled *Bernard Ward and Colleen Halloran v. GMAC Mortgage, LLC and Does 1-20*, Case No. CGC-11-511574, filed in the Superior Court of the State of California, City and County of San Francisco ("State Court Action").

4. I submit this declaration (the "Declaration") in support of the *ResCap Borrower Claims Trust's Objection To Claim No. 684 Filed By Bernard Ward and Colleen Halloran* (the "Objection").

5. Except as otherwise indicated, all facts set forth in this Declaration are based upon my personal knowledge of Ward and Halloran's litigation against GMACM and the Firm's role in that litigation, and all statements made in this Declaration are based on my

familiarity with the Firm's book and records kept in the course of its regularly conducted business activities. If I were called upon to testify, I could and would testify competently to the facts set forth herein on that basis.

6. On June 8, 2011, the Claimants filed a complaint against GMACM (the "Complaint"), commencing the State Court Action. A copy of the Complaint is attached hereto as Exhibit A.

7. GMACM filed an answer to the Complaint on July 15, 2011. The parties subsequently engaged in written discovery, including responding to document production requests. In response to the document production requests, GMACM provided the Claimants with a number of documents from its books and records. The documents provided included, among others, the following:

- a. Second Loan Modification, dated July 22, 2011, a copy of which is attached hereto as Exhibit B;
- b. July 28, 2011 Email Between Employee of GMACM, a copy of which is attached hereto as Exhibit C.

8. In response to the document production requests, the Claimants provided GMACM with a number of documents that they sent or received from GMACM. The documents received included, among others, the following:

- a. Financial Analysis Form, a copy of which is attached hereto as Exhibit D;
- b. Letter from Timothy Halloran, a copy of which is attached hereto as Exhibit E.

9. GMACM also deposed Timothy Halloran, the Claimant's attorney, and Colleen Halloran. Copies of those deposition transcripts are attached hereto as Exhibit F and Exhibit G, respectively.

10. On February 17, 2012, GMACM filed a Motion for Summary Judgment in the State Court Action. Before GMACM's Motion for Summary Judgment was heard, the litigation was stayed on May 29, 2012 as a result of the Debtor's bankruptcy case. The stay remains in effect. See State Court Docket, attached hereto as Exhibit H.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 14, 2016

/s/ Gregory L. Huber  
Gregory L. Huber  
Severson & Werson, LLP